

SBC Illinois Performance Measure Failures

Docket No. 01-0662
ICC Staff Exhibit 28.0
Schedule 28.05

Checklist Item	Staff Exhibit	Staff Phase II Conclusions	Staff Recommendations
<p style="text-align: center;">Item 2 Access to Network Elements - OSS</p>	<p style="text-align: center;">Staff Exhibits: 29.0, 30.0, 31.0</p>	<p>SBC Illinois Performance Measurement Results (3 months)</p> <p>The three months of performance measurement data submitted by the company in support of checklist (ii) does not demonstrate that with respect to the ordering or provisioning performance measures SBC Illinois is providing non-discriminatory service to the CLECS.</p>	<p>(1) SBC Illinois should be required to correct the deficiencies associated with the ordering performance measures that apply to check list item (ii) prior to receiving a positive Section 271 recommendation from this Commission. If the Commission decides to provide a conditional recommendation to the FCC, then the company should be required to address its deficiency with these measurements per the timeframe specified in the affidavit of Samuel McClerren. Staff Ex. 29.0.</p>
<p style="text-align: center;">Item 2 Access to Network Elements - OSS</p>	<p style="text-align: center;">Staff Exhibit 30.0</p>	<p>SBC's performance measures with respect to billing are generally satisfactory with the exception of PM17 - timeliness. SBC consistently gives its affiliate more timely bills than it gives the CLECs. Moreover, this has been a persistent problem over the last year and SBC has failed to demonstrate much improvement over that time period.</p>	<p>SBC Illinois must identify the steps that it will take to correct its unsatisfactory performance with respect to PM17 - billing timeliness. The company then must implement its plan and demonstrate substantially improved performance six months hence.</p>

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<p style="text-align: center;">Item 4 Unbundled Loops</p>	<p style="text-align: center;">Staff Exhibit 32.0</p>	<p>Performance Measurement - Checklist Item 4 – Unbundled Local Loops – Stand-Alone DSL Loops: The PM data submitted by the Company indicates that the Company meets benchmarks for installation timeliness, installation quality, and post installation maintenance and repair when installing stand-alone DSL loops. The Company is not, however, meeting FMOD process benchmarks including those measured by submeasure C WI 6 – 02.</p>	<p>Checklist Item 4 – Unbundled Local Loops – Stand-Alone DSL Loops: As a prerequisite to a positive consultation with the FCC regarding whether the Company is provisioning its stand-alone DSL loops in accordance with the requirements of Section 271(c)(2)(B)(iv), the Commission should require the Company to send FMOD Form A notifications on time. The Company should, in it's rebuttal affidavits, explain why this problem is occurring and demonstrate that proper steps have been taken to ensure that the problem is corrected on a going forward basis.</p>
<p style="text-align: center;">Item 4 Unbundled Loops</p>	<p style="text-align: center;">Staff Exhibit 32.0</p>	<p>Performance Measurement - Checklist Item 4 – Unbundled Local Loops – DSL Loops With Linesharing: The PM data submitted by the Company indicates that the Company meets parity criteria for installation timeliness when installing DSL loops with linesharing. Installation quality and repair and maintenance of installed DSL loops with linesharing,</p>	<p>Checklist Item 4 – Unbundled Local Loops –DSL Loops With Linesharing: As a prerequisite to a positive consultation with the FCC regarding whether the Company is provisioning its DSL loops with linesharing in accordance with the requirements of Section 271(c)(2)(B)(iv), the Commission should require the Company to provide DSL with linesharing loop quality and</p>

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		however, is not provided at parity as indicated by the fact that the Company is not meeting parity criteria with respect to submeasures 59-03, 65-03, 65.1-03, 67-03, 67-18, and 66-03.	maintenance and repair service to CLECs that is at least as good as the loop quality and maintenance and repair service the Company provides to its affiliate. The Company should, in its rebuttal affidavits, explain why these problems are occurring and demonstrate that proper steps have been taken to ensure that these problems are corrected on a going forward basis.
Item 4 Unbundled Loops	Staff Exhibit 32.0	Performance Measurement- Checklist Item 4 – Unbundled Local Loops – Unbundled Voice Grade Loops: The PM data submitted by the Company indicates that the Company is not always meeting parity criteria for installation timeliness when installing voice grade loops. For the three months ending in November of 2002, the Company failed to meet parity criteria for PMs 55-01.1, 55-01.2, and 55-01.3 three out of the eight times parity criteria were evaluated. As reflected in PMs 56-01.1 and 56-01.2 the Company missed parity	Checklist Item 4 – Unbundled Local Loops – Unbundled Voice Grade Loops: As a prerequisite to a positive consultation with the FCC regarding whether the Company is provisioning its voice grade loop service in accordance with the requirements of Section 271(c)(2)(B)(iv), the Commission should require the Company to correct the voice grade loop provisioning problems identified above, in particular the disparity in average installation intervals and missed customer requested due dates and the problems with provisioning voice grade loops requiring complex

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		<p>criteria for meeting non-standard customer requested due dates one out of the six times parity criteria were evaluated. In September of 2002, missed due dates caused a delay in provisioning of CLEC service, measured by submeasure 62-03 that was much longer than missed due date caused delays for the Company's retail customers. Submeasures 58-05 and 60-03.1, however, indicate that the Company is meeting parity standards with respect to Company caused missed due dates and due dates missed due to lack of facilities. With respect to loops with LNP the Company generally met benchmark installation intervals. Installation quality and repair and maintenance of installed voice grade loops is generally provided at parity. The Company is, however, as submeasure C WI 11 – 01.4 indicates, failing parity criteria for meeting due dates for FMOD installations.</p>	<p>facilities modification. The Company should, in it's rebuttal affidavits, explain why these problem are occurring and demonstrate that proper steps have been taken to ensure that these problem are corrected and will not recur on a going forward basis.</p>

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		<p>Performance Measurement - Checklist Item 4 – Unbundled Local Loops – Unbundled BRI (digital) Loops: The PM data submitted by the Company indicates that, regarding the Company's performance in installing and servicing BRI loops, the Company is providing service at parity with respect to installation timeliness and provisioning quality. While CLEC customers experience more troubles after installation, the Company generally responds to these troubles faster and more effectively than it does to it's retail customer's post-installation troubles. Submeasure C WI 11-01.5 indicates the Company is missing FMOD installation due dates more often for CLECs than for its own retail customers.</p>	<p>Checklist Item 4 – Unbundled Local Loops – Unbundled BRI (digital) Loops: As a prerequisite to a positive consultation with the FCC regarding whether the Company is provisioning its standard BRI Loop service in accordance with the requirements of Section 271(c)(2)(B)(iv), the Commission should require the Company to correct the problems it has with provisioning BRI loops requiring complex facilities modification. The Company should, in it's rebuttal affidavits, explain why this problem is occurring and demonstrate that proper steps have been taken to ensure that this problem is corrected and will not recur on a going forward basis.</p>
<p style="text-align: center;">Item 4 Unbundled Loops</p>	<p style="text-align: center;">Staff Exhibit 32.0</p>	<p>Performance Measurement Review - Checklist Item 4 – Unbundled Local Loops – Unbundled DS1 Loops: The PM data submitted by the Company indicates that the</p>	<p>Checklist Item 4 – Unbundled Local Loops – Unbundled DS1 Loops: As a prerequisite to a positive consultation with the FCC regarding whether the Company is provisioning its</p>

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		<p>Company is providing unbundled DS1 loop service at parity with respect to installation timeliness, installation quality, and repair and maintenance service. The submeasure C WI 11 – 01.6 indicates, however, that the Company is not meeting due dates associated with DS1 loop orders requiring complex modification.</p>	<p>DS1 loops in accordance with the requirements of Section 271(c)(2)(B)(iv), the Commission should require the Company to correct the problems it has with provisioning DS1 loops requiring complex facilities modification. The Company should, in its rebuttal affidavits, explain why these problems are occurring and demonstrate that proper steps have been taken to ensure that these problems are corrected and will not recur on a going forward basis.</p>
<p>Item 7 911, E-911, Directory Assistance, and Operator Services</p>	<p>Staff Exhibit 36.0</p>	<p>Staff is concerned about SBC Illinois' inability to update its directory assistance database. Although SBC Illinois' average update times appear to meet national standards, it is not clear if all updates are being accomplished within this time frame.</p>	<p>The Commission should require the Company to confirm that all individual updates meet the 24 hour NEMA standard and provide additional explanation regarding its failure to meet PM 104. The Commission should also require the Company to explain why and/or how it will comply with PM 104 on a going forward basis. If SBC Illinois believes compliance with PM 104 cannot be achieved, then the Company should propose an alternative to measure and track this 911 service.</p>

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Item 14 Resale	Staff Exhibit 29.0	<p>SBC Illinois failed PM 37-1, which reflects service quality to all residential plain old telephone service (“POTS”) customers. It is also a PM in which SBC Illinois has successfully met the standard in previous months – specifically, April 2002 through September 2002. Inexplicably, SBC Illinois failed this sub-measure in October and November 2002.</p>	<p>The Commission should require the Company to correct the problems it has with trouble reports for CLEC POTS customers. The Company should, in it’s rebuttal affidavits, explain why these problems are occurring and demonstrate that proper steps have been taken to ensure that these problems are corrected and will not recur on a going forward basis.</p>
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